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April 14, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. Plaintiff writes in accordance with this Court’s March 31, 2025 Memorandum & Order to respectfully submit a proposed Public Website Notice and address the parameters of same. See ECF Docket Entry [448](#).

The Contents of the Public Website Notice

PLEASE BE ADVISED, that IME Legal Reps, IME Companions, LLC, Client Exam Services LLC, Accompanied Exam Services, IME Management & Consulting LLC, and the IME Company, together with their respective managers, agents, and/or employees, have been enjoined by Order of Hon. Pamela K. Chen, U.S.D.J., in *IME Watchdog, Inc. v. Gelardi* (22-cv-1032), from providing any services to you pending a further order of the Court to the extent you were previously a customer of IME WatchDog, Inc. For more information, please see ECF Docket Entries [66](#) (May 13, 2022 Order), [66-1](#) (First Preliminary Injunction), [80](#) (Amended Preliminary Injunction), [254](#) (October 20, 2023 Order), [254-1](#) (Second Amended Preliminary Injunction), [284](#) (February 29, 2024 Order), [299](#) (March 13, 2024), [299-1](#) (Second Amended Preliminary Injunction), [365](#) (July 1, 2024 Order), [394](#) (September 25, 2024 Order), [398](#) (September 30, 2024), [448](#) (March 31, 2025), [448-1](#) (Third Amended Preliminary Injunction).

The Parameters of the Public Website Notice

Plaintiff respectfully requests the Court issue an Order directing the Defendants and non-parties IME Legal Reps (“IMELR”) and Eugene Liddie (“Liddie”) to provide access to the website manager in order to place the notice on each domain’s website, and to do so in a visible and conspicuous manner, such as a popup that must be acknowledged before proceeding to the website. Thus, the website should display the above proposed Public Website Notice as a pop-up that must be acknowledged by closing it.

Separately, the Public Website Notice should appear a second time on the page where one may book IME observer services with a warning that the customer may be subject to sanctions if they were previously a customer of IME WatchDog. Plaintiff respectfully proposes the following slightly modified Public Website Notice upon clicking the link to book IME observer services:

PLEASE BE ADVISED, that IME Legal Reps, IME Companions, LLC, Client Exam Services LLC, Accompanied Exam Services, IME Management & Consulting LLC, and the IME Company, together with their respective managers, agents, and/or employees, have been enjoined by Order of Hon. Pamela K. Chen, U.S.D.J., in *IME Watchdog, Inc. v. Gelardi* (22-cv-1032), from providing any services to you pending a further order of the Court to the extent you were previously a customer of IME WatchDog, Inc.

PLEASE BE FURTHER ADVISED, that proceeding to make a request with this company may subject you to sanctions to the extent you were previously a customer of IME WatchDog, Inc.

For more information, please see ECF Docket Entries [66](#) (May 13, 2022 Order), [66-1](#) (First Preliminary Injunction), [80](#) (Amended Preliminary Injunction), [254](#) (October 20, 2023 Order), [254-1](#) (Second Amended Preliminary Injunction), [284](#) (February 29, 2024 Order), [299](#) (March 13, 2024), [299-1](#) (Second Amended Preliminary Injunction), [365](#) (July 1, 2024 Order), [394](#) (September 25, 2024 Order), [398](#) (September 30, 2024), [448](#) (March 31, 2025), [448-1](#) (Third Amended Preliminary Injunction).

The proposed modification is italicized above.

Plaintiff Should be Provided with Access to the Websites

Plaintiff also wishes to express concern over the fact that many of the websites that were previously operating have since gone dark. Specifically, www.imecompanions.com is not live, nor is www.accompaniedexams.com. Plaintiff learned last week that www.imelegalreps.com went down, but – following a telephonic meet-and-confer with Liddie's and IMELR's counsel – the website went back up.

Based on the foregoing, Plaintiff respectfully submits that the proposed Public Website Notices are appropriate, and thanks this honorable Court for its continued time and attention to this case.

Dated: Lake Success, New York
April 14, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
April 14, 2025

SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)